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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

-v.- : INFORMATION

EARNEST JAMES UJAAMA, : S3 04 Cr. 356 (JFK)

a/k/a "James Ujaama," :

a/k/a "Bilal Ahmed," :

a/k/a "Abu Sumaya," :

a/k/a "Abdul Qaadir," :

a/k/a "James Earnest Thompson," :

Defendant. :

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USDC SDNY
DOCUMENT
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COUNT ONE

CONSPIRACY TO PROVIDE AND CONCEAL
MATERIAL SUPPORT OR RESOURCES TO TERRORISTS
(THE BLY, OREGON JIHAD TRAINING CAMP)

The United States Attorney charges:

1. From in or about October 1999, up to and including in or about early 2000, in the Southern District of New York and elsewhere, EARNEST JAMES UJAAMA, a/k/a "James Ujaama," a/k/a "Bilal Ahmed," a/k/a "Abu Sumaya," a/k/a "Abdul Qaadir," a/k/a "James Earnest Thompson," the defendant, and others known and unknown, at least one of whom was first brought to and arrested in the Southern District of New York, unlawfully and knowingly combined, conspired, confederated and agreed together and with each other to violate Section 2339A of Title 18, United States Code.

2. It was a part and an object of the conspiracy that EARNEST JAMES UJAAMA, the defendant, and others known and unknown, would and did, within the United States, provide material support

or resources and conceal and disguise the nature, location, source, and ownership of material support or resources, knowing and intending that they were to be used in preparation for, and in carrying out, a violation of Section 956 of Title 18, United States Code (conspiring to kill, kidnap, maim, and injure persons and to damage and destroy property in a foreign country), and in preparation for, and in carrying out, the concealment and an escape from the commission of such violation.

Overt Acts

3. In furtherance of said conspiracy, and to effect the illegal object thereof, the following overt acts, among others, were committed:

a. On several occasions in or about October 1999, EARNEST JAMES UJAAMA, the defendant, a U.S. citizen, discussed with Mustafa Kamel Mustafa, a/k/a "Abu Hamza" (hereafter "Abu Hamza") the creation of a jihad training camp in Bly, Oregon. During these discussions, EARNEST JAMES UJAAMA, the defendant, asked Abu Hamza to send two of Abu Hamza's followers to the United States in order to assist UJAAMA in raising money and establishing the Bly, Oregon jihad training camp.

b. On or about October 25, 1999, EARNEST JAMES UJAAMA, the defendant, faxed a letter to Abu Hamza stating, among other things, that he and others were stock-piling weapons and ammunition in the United States. EARNEST JAMES UJAAMA, the

defendant, also wrote to Abu Hamza that he was "expecting the two brothers that we discussed to come in November."

c. In or about late November 1999 or early December 1999, EARNEST JAMES UJAAMA, the defendant, met Oussama Abdullah Kassir (hereafter "Kassir"), Haroon Rashid Aswat (hereafter "Aswat"), and others at a bus station in Seattle, Washington, so that they could travel together to Bly, Oregon in order to assist UJAAMA in raising money and establishing the Bly, Oregon jihad training camp, as requested by Abu Hamza.

d. In or about early December 1999, Kassir, Aswat, and others arrived at the Bly, Oregon property with EARNEST JAMES UJAAMA, the defendant, in order to assist UJAAMA in raising money and establishing the Bly, Oregon jihad training camp, as requested by Abu Hamza.

(Title 18, United States Code, Section 371.)

COUNT TWO

CONSPIRACY TO PROVIDE AND CONCEAL MATERIAL SUPPORT OR RESOURCES TO TERRORISTS (FACILITATING VIOLENT JIHAD IN AFGHANISTAN)

The United States Attorney further charges:

4. From in or about June 2000, up to and including on or about December 19, 2001, in the Southern District of New York and elsewhere, EARNEST JAMES UJAAMA, a/k/a "James Ujaama," a/k/a "Bilal Ahmed," a/k/a "Abu Sumaya," a/k/a "Abdul Qaadir," a/k/a "James Earnest Thompson," the defendant, and others known and

unknown, at least one of whom was first brought to and arrested in the Southern District of New York, unlawfully and knowingly combined, conspired, confederated and agreed together and with each other to violate Section 2339A of Title 18, United States Code.

5. It was a part and an object of the conspiracy that EARNEST JAMES UJAAMA, the defendant, and others known and unknown, would and did provide material support or resources and conceal and disguise the nature, location, source, and ownership of material support or resources, knowing and intending that they were to be used in preparation for, and in carrying out, a violation of Section 956 of Title 18, United States Code (conspiring to kill, kidnap, maim, and injure persons and to damage and destroy property in a foreign country), and in preparation for, and in carrying out, the concealment and an escape from the commission of such violation.

Overt Acts

6. In furtherance of said conspiracy, and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. In or about June 2000, EARNEST JAMES UJAAMA, the defendant, a U.S. citizen, traveled from London, England, to New York, in part, to raise money for the Finsbury Park Mosque's hijrah fund from worshipers at local mosques. During this trip, UJAAMA traveled through Manhattan, New York, on his way to attempt to collect money at a mosque in Long Island, New York, which money

Ujaama intended to add to the Finsbury Park Mosque's hijrah fund when he returned to London.

b. In or about November 2000, Abu Hamza asked EARNEST JAMES UJAAMA, the defendant, to escort another co-conspirator not named as a defendant herein ("Co-Conspirator 1") from London, England, to a jihad training camp in Afghanistan operated by a "front-line commander." Co-Conspirator 1 was one of Abu Hamza's followers.

I'm not doing this with you. He not going to around this, my looked

c. In or about November 2000, EARNEST JAMES UJAAMA, the defendant, took money out of the Finsbury Park Mosque's hijrah fund, which was to be used for certain travel expenses relating to the trip to Afghanistan with Co-Conspirator 1.

d. In or about November 2000, Abu Hamza introduced EARNEST JAMES UJAAMA, the defendant, to another co-conspirator not named as a defendant herein ("Co-Conspirator 2") for purposes of arranging safehouses and lodging in Pakistan and safe passage and transportation into Afghanistan.

Bergali or mutawakil ? or Shik. Fatimi or Bilal Fatimi

e. In or about November 2000, EARNEST JAMES UJAAMA, the defendant, and Co-Conspirator 1 traveled together from London, England, to Pakistan. Both men separately entered Afghanistan shortly thereafter.

(Title 18, United States Code, Section 2339A.)

COUNT THREE

PROVIDING AND CONCEALING
MATERIAL SUPPORT OR RESOURCES TO TERRORISTS
(FACILITATING VIOLENT JIHAD IN AFGHANISTAN)

The United States Attorney further charges:

7. From in or about June 2000, up to and including on or about December 19, 2001, in the Southern District of New York and elsewhere, EARNEST JAMES UJAAMA, a/k/a "James Ujaama," a/k/a "Bilal Ahmed," a/k/a "Abu Sumaya," a/k/a "Abdul Qaadir," a/k/a "James Earnest Thompson," the defendant, and others known and unknown, at least one of whom was first brought to and arrested in the Southern District of New York, unlawfully and knowingly provided material support or resources and concealed and disguised the nature, location, source, and ownership of material support or resources, knowing and intending that they were to be used in preparation for, and in carrying out, a violation of Section 956 of Title 18, United States Code (conspiring to kill, kidnap, maim, and injure persons and to damage and destroy property in a foreign country), and in preparation for, and in carrying out, the concealment and an escape from the commission of such violation, and attempted to do such an act, to wit, UJAAMA escorted Co-Conspirator 1 from London, England, to Pakistan for purposes of receiving jihad training in Afghanistan and thereafter fighting jihad on the front lines in Afghanistan.

(Title 18, United States Code, Sections 2339A and 2.)

COUNT FOUR

UNLAWFUL FLIGHT TO AVOID GIVING TESTIMONY
(UJAAMA'S FLIGHT TO BELIZE)

The United States Attorney further charges:

8. From at least on or about December 2, 2006, up to and including on or about December 18, 2006, in the Southern District of New York and elsewhere, EARNEST JAMES UJAAMA, a/k/a "James Ujaama," a/k/a "Bilal Ahmed," a/k/a "Abu Sumaya," a/k/a "Abdul Qaadir," a/k/a "James Earnest Thompson," the defendant, unlawfully, willfully and knowingly moved and traveled in interstate and foreign commerce with the intent to avoid giving testimony in criminal proceedings in such place in which the commission of an offense is a felony under the laws of such place, is charged, to wit, the Southern District of New York.

(Title 18, United States Code, Section 1073.)



MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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Defendant.

INFORMATION

S3 04 Cr. 356 (JFK)

(Title 18, United States Code,
Sections 2, 371, 1073, and 2339A)

MICHAEL J. GARCIA
United States Attorney.

8-13-07 (WR): Filed 3rd Superseding Information and
Waiver of Indictment. Deft. present with atty.
Peter Offenbecher. AUSA Eric Bruce present. Deft.
pleads guilty to Counts one through Four. Court accepts
plea. PSI ordered. Sentencing date: 12-12-2007 at 10:00
Deft. Remanded. Keenan, J.